

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and others
similarly situated,*

Plaintiffs,

National Football League and
NFL Properties LLC,
successor-in-interest to NFL Properties,
Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
Plaintiff Marquice Cole - 900003700

Case No. 12-md-2323 (AB)

MDL No. 2323

Hon. Anita B. Brody

**PETITION TO ESTABLISH
ATTORNEYS' FEE LIEN**

COMES NOW Petitioner, Attorney Patrick J. Tighe, X1LAW, PA, pursuant to an executed Attorneys' Fee Contract, and states as follows:

1. Petitioner is an attorney at law admitted to practice before the courts of Florida, and files this Petition to establish a lien for attorney's fees as set forth hereinafter.

2. On or about December 2, 2016, Petitioner, Patrick J. Tighe, Esquire, was retained and employed by Plaintiff, Marquice Cole, pursuant to an agreement for legal services, to pursue a claim for injuries and damages allegedly caused by the National Football League's conduct associated with football related concussions, head and brain injuries.

3. The specifics of the agreement for legal services are as follows: If no recovery (by settlement or trial) is obtained, Plaintiff will not owe a legal fee. If Attorney Patrick J. Tighe obtains

a settlement or judgment for the Plaintiff, Plaintiff will pay to the Petitioner a fee of thirty-three and one third percent (33 1/3%) of the gross recovery plus reimbursement of expenses.

4. When the Petitioner entered into contract with the Plaintiff, Petitioner entered into the risk and expense of pursuing the claim.

5. From the date the Petitioner was authorized to proceed on behalf of the Plaintiff, the Petitioner has actively and diligently investigated, prepared and pursued Plaintiff's claims, and has taken all steps necessary to prosecute those claims, including, but not limited to, correspondence and communications with the client, preparation and review of client's factual and legal circumstances, drafting and providing client updates, analyzing Plaintiff's medical status and need for medical testing, scheduling and making arrangements for Plaintiff to undergo medical evaluation and testing to obtain a diagnosis of Plaintiff's medical condition for eligibility and entitlement to obtaining a monetary award pursuant to the NFL Settlement Agreement guidelines, etc.

6. The Plaintiff has discharged the Petitioner as his attorney in this matter, and it is expected that a new attorney will be pursuing representation of the Plaintiff in this action.

7. Petitioner was not terminated due to any malfeasance or other improper action.

8. The Petitioner claims the right to have a lien for attorney's fee and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiff in this action.

WHEREFORE, the Petitioner prays:

1. That an attorney's lien be established;
2. That the amount of the lien be determined;

3. That the Court order that Petitioner be entitled to enforce an attorney's lien against the proceeds to be derived from any settlement or judgment in this action;
4. That the Defendant or the Defendant's insurer be prohibited from paying to the Plaintiff any sums of money until said lien has been satisfied; and,
5. For such other further relief as this Court deems just.

Dated: April 12, 2018

Respectfully Submitted,

LOREN & KEAN LAW

By: s/Michael G. St. Jacques, II

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2018, the foregoing Petition to Establish Attorney's Lien was electronically filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, and that the filing is available for downloading and viewing from the electronic court filing system by counsel for all parties.

LOREN & KEAN LAW

s/ Michael St. Jacques

MICHAEL G. ST. JACQUES, II